

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	Chapter 11
In re:	:
Sears Holdings Corporation, et al.,	:
	:
	:
Debtor	:
-----X	

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE THAT the undersigned hereby appears as counsel for AMERICAN CASTING & MANUFACTURING CORP. ("American Casting") and as such counsel hereby enters appearance pursuant to section 1109(b) of the Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 sections 342 and 1109(b) of the Bankruptcy Code, that all copies of all notices and pleadings given or filed in this action be served upon the undersigned at the address stated below and otherwise in accordance with ECF filing notice procedures.

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PLEASE TAKE FURTHER NOTICE THAT, pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any notice, application, complaint demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telecopy, email or otherwise filed or made with regard to the referenced case and proceedings herein with respect to (1) that affects or seeks to affect in any way, any

rights or interests of any creditor or party of interest in this case including American Casting & Manufacturing Corp. with respect to: a) the debtor; b) property of the estate, or proceeds thereof in which the debtor may claim an interest; or c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to us; or (2) that requires or seeks to require any act, delivery of any property, payment, or other conduct by American Casting & Manufacturing Corp..

PLEASE TAKE FURTHER NOTICE THAT, neither this Notice of Appearance nor any former or later appearance, pleading, claim or suite shall waive (1) American Casting's right to have final orders in non-core matters entered only after de novo review by a District Court Judge, (2) American Casting's right to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case, (3) American Casting's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, action, defenses, including defenses to jurisdiction, setoffs or recoupments to which American Casting may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments American Casting expressly reserves.

Dated: April 4, 2019
Woodbury, New York

Respectfully submitted,

COLLERAN, O'HARA & MILLS L.L.P.

By: 

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